



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

August 9, 2013

Joe Incardine, Sun Valley-Morgan Project
Hassayampa Field Office, BLM
21605 North 7th Avenue
Phoenix, Arizona 85207-2929

Subject: Proposed Sun Valley to Morgan 500/230 kV Transmission Line Project Final Environmental Impact Statement and Harquahala Resource Management Plan Amendment, Maricopa County, AZ (CEQ#20130212)

Dear Mr. Incardine:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement for the Sun Valley to Morgan 500/230 kV Transmission Line Project pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and our NEPA review authority under Section 309 of the Clean Air Act.

The EPA reviewed the Draft Environmental Impact Statement and provided comments to the Bureau of Land Management on February 8, 2013. We rated the DEIS as *Environmental Concerns—Insufficient Information* (EC-2), primarily due to potential direct and indirect impacts to water resources. We asked for additional information regarding the geographic extent of jurisdictional waters in the project area.

We appreciate the efforts of the Bureau of Land Management, Arizona Public Service Company, and its consultants to respond to our DEIS comments, and we commend the applicant and BLM for developing additional mitigations that support an environmentally preferable outcome.

We were pleased to note that the Waters of the U.S. had been identified through a Preliminary Jurisdictional Determination and that it had been submitted to the U.S. Army Corps of Engineers for review and concurrence. The EPA strongly encourages the integration of NEPA with the Clean Water Act Section 404 process, to streamline permitting and to align the alternatives analyses of these processes. In the interest of avoiding unnecessary delays and facilitating the development of the most environmentally sound transmission line projects, we encourage the BLM to view these other regulatory requirements as an integral part of the NEPA process.

We note that the FEIS includes additional discussion to address our recommendations regarding air quality, ephemeral washes, and placement of structures in flood plains. Further, we acknowledge changes in the FEIS to address our recommendations regarding tribal consultations.

We appreciate the opportunity to review the FEIS for the Sun Valley to Morgan 500/230 kV

Transmission Line Project. When the Record of Decision is signed, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact Scott Sysum at (415) 972-3742 or sysum.scott@epa.gov.

Sincerely,

/s/ Connell Dunning for

Kathleen Martyn Goforth
Manager
Environmental Review Office (CED-2)
Communities and Ecosystems Division